



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3000 • Sacramento, CA 95811

April 6, 2020

Marsi Steirer

Via email at: [REDACTED]

**Warning Letter Re: FPPC No. 2020-00376; Marsi Steirer**

Dear Ms. Steirer:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> This letter is in response to a sworn complaint filed against you that alleged you violated the Act’s Statement of Economic Interests (“SEI”) disclosure requirements. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to timely disclose your business position as a Principal with MAS Agua Consulting on your 2017 Annual and 2018 Annual SEIs.

The Act requires that every agency adopt and promulgate a Conflict of Interest Code pursuant to the provisions of this article. A Conflict of Interest Code shall have the force of law and any violation of a Conflict of Interest Code by a designated employee shall be deemed a violation of this chapter.<sup>2</sup> Under the City of Coronado’s Conflict of Interest Code, as a Commissioner of the City of Coronado’s Civil Service Commission, you are required to disclose all investments, business positions in, and income, including gifts, loans, and travel payments, from sources located in or doing business in the jurisdiction.

Your actions violated the Act because you failed to timely report your business position as a Principal with MAS Agua Consulting on your 2017 Annual and 2018 Annual SEIs for your position as a Commissioner with the City of Coronado’s Civil Service Commission as required by the agency’s Conflict of Interest Code. However, mitigating factors exist such that we have decided to close your case with this warning letter rather than issue a fine. Immediately after being contacted by the Enforcement Division, you filed amendments to your 2017 Annual and 2018 Annual SEIs to disclose this interest. Additionally, MAS Agua Consulting did not generate any reportable income during the calendar years of 2017 and 2018. Since MAS Agua did not generate

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

<sup>2</sup> Section 87300.

income during these calendar years, there was some confusion on your reporting obligation for disclosing this business entity on your SEIs. Moreover, you have no prior history of violating the Act.

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the Enforcement Division will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the Commission's website ten (10) days from the date of this letter.

If you need forms or a manual, or guidance regarding your obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at [www.fppc.ca.gov](http://www.fppc.ca.gov).

Please feel free to contact Chloe Hackert at (916) 322-8190 or [chackert@fppc.ca.gov](mailto:chackert@fppc.ca.gov) with any questions you may have regarding this letter.

Sincerely,

A handwritten signature in cursive script that reads "GWest".

Galena West, Chief  
Enforcement Division

GW/ ch

cc: Ray Richardson, sworn complainant